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UBER TECHNOLOGIES, INC.
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19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 WAYMO LLC,
23 Plaintiff,
24 v.
25 UBER TECHNOLOGIES, INC.,
26 OTTOMOTTO LLC; OTTO TRUCKING LLC,
27 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
THEIR RESPONSE TO WAYMO
LLC'S SUPPLEMENTAL BRIEF FOR
MOTION FOR ORDER TO SHOW
CAUSE**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Response to Waymo LLC’s Supplemental Brief for Motion for Order to Show Cause. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Waymo’s Supplemental Brief (“Response”)	Highlighted Portions	Defendants (blue) Non-parties Sandstone Group, Tyto LiDAR, and Ognen Stojanovski (yellow)
Exhibit 2	Entirety	Non-parties Sandstone Group, Tyto LiDAR, and Ognen Stojanovski (yellow)

The blue-highlighted portions of the Response contain highly confidential information regarding a confidential potential vendor relating to LiDAR for Defendants. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. Defendants request this information be kept under seal to protect the confidentiality of the identity of this potential vendor. I understand that disclosure of the identity of this confidential vendor would allow Uber’s competitors to understand Uber’s development strategy, such that they could tailor their own development of LiDAR and Uber’s competitive standing could be significantly harmed. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.)

The yellow-highlighted portions of the Response and the entirety of Exhibit 2 contain confidential information of non-parties Sandstone Group, Tyto LiDAR, and Ognen Stojanovski, who have requested that their confidentiality interests be respected in this proceeding. (Yang Decl. ¶ 4.) Defendants expect these non-parties to file supporting declarations as needed.

1 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
2 documents at issue, with accompanying chamber copies.

3 Defendants served Waymo with this Administrative Motion to File Documents Under
4 Seal on September 15, 2017.

5 For the foregoing reasons, Defendants request that the Court enter the accompanying
6 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and
7 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –
8 ATTORNEYS' EYES ONLY."

9
10 Dated: September 15, 2017

MORRISON & FOERSTER LLP

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12 By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ

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